

**UNITED STATES DISTRICT COURT**  
NORTHERN DISTRICT OF ILLINOIS

DENNIS HOGUE,

Plaintiff,

v.

ILLINOIS DEPARTMENT OF  
CORRECTIONS, WARDEN JOHN VARGA,  
WEXFORD HEALTH SOURCES, INC., DR.  
MERRILL ZAHTZ, NURSE SUSAN TUELL,  
and DOE NO. 1;

Defendants.

Case Number 19-cv-50151

Hon. Judge Iain D. Johnston

Magistrate Judge Lisa A. Jensen

**JOINT STATUS REPORT: DISCOVERY**

Plaintiff and Defendants, through their undersigned counsel, submit the following Joint Status Report as required by the Court's minute order of June 9, 2021.

**Progress of Discovery**

Plaintiff served its requests for production on Defendant Varga on June 8, 2021. Plaintiff agreed to Defendant Varga's request for an extension of time, up to and including August 31, 2021. Plaintiff will serve subpoenas on third parties when appropriate as his investigation continues. Defendants have not issued discovery but intend to take the deposition of Plaintiff.

Respectfully Submitted,

By: /s/ David E. Jimenez-Ekman, Esq.  
One of the Attorneys for Plaintiff,  
DENNIS HOGUE

John H. Mathias, Jr., Esq.  
David E. Jimenez-Ekman, Esq.  
Christian Plummer, Esq.  
Leah M. Song, Esq.  
Jenner & Block LLP  
353 North Clark Street  
Chicago, IL 60654  
(312) 222-9350  
jmathias@jenner.com  
djimenez-ekman@jenner.com  
cplummer@jenner.com  
lsong@jenner.com

By: /s/ Maebetty Kirby  
One of the Attorneys for Defendants  
JOHN VARGA and the ILLINOIS  
DEPARTMENT OF CORRECTIONS

Maebetty Kirby  
Assistant Attorney General  
Office of the Illinois Attorney General  
100 W. Randolph Street, 13th Floor  
Chicago, Illinois 60601  
(773) 590-7857  
Mary.kirby@ilag.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on August 10, 2021, I electronically filed the foregoing document with the clerk of the court for Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

/s/ David E. Jimenez-Ekman, Esq.

David E. Jimenez-Ekman, Esq.  
(Ill. Bar No. 6210519)  
Jenner & Block LLP  
353 North Clark Street  
Chicago, IL 60654  
(312) 222-9350  
djimenez-ekman@jenner.com